

LOTTODAY PRIVACY POLICY

Last Revised: January 14, 2018

I. INTRODUCTION

- Phoenix Online Holdings Ltd (“us”, “we”, “our” or the “**Company**”) is a company registered in the British Virgin Islands, and has offices based in Gibraltar and India for the purposes of online independent lottery ticket purchasing. We respect your privacy and are committed to protect the privacy of our users (“user”, “you” or “**Player**”).
- This privacy policy (“**Privacy Policy**”) outlines our practices with respect to collecting, using and disclosing your information through the use of our online purchasing system portal www.Lottoday.com (the “**Website**”), which is used to procure the purchase, storage and handling of tickets and the collection of Players' winnings (collectively, “**the Services**”). It also describes the choices you can make about how the information you provide us is used.
- We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using our Services, you agree to the terms of this policy. If you do not agree with this policy, please do not supply us any information.
- The Privacy Policy is a part of our Terms of Service and is incorporated therein by references.
- **Please Note:** our policies strictly prohibit citizens and residents of the United States, and any individuals located within the United States, from purchasing tickets for any draw held by an operator in the United States or in any other jurisdiction. The Services shall not be construed as an invitation or an offer to any US citizens and residents. You hereby represent that you are not a citizen and/or a resident of the United States or that you are not currently located in the United States.

II. WHAT TYPE OF INFORMATION WE COLLECT?

NON-PERSONAL INFORMATION

- The first type of information is non-identifiable information that, when taken alone, cannot be used to identify or contact our users (“**Non-personal Information**”). As such, we are not aware of the identity of the user from which the Non-personal Information was collected.
- We collect information Non-personal Information such as your username, password, aggregated usage information, technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to the Services; etc.).
- We collect information about your use of the Services, such as log files, user activity (e.g. pages viewed, the amount of time spent on particular pages, online browsing, clicks, actions, etc.).

PERSONAL INFORMATION

- The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Information**"). When you use our Services you will be asked to provide Personal Information to us. This includes:
 - **Data submitted when registering to our Services:** In order to become Players and use our Services, you will be required to register and open a User account or register via your Facebook account. As part of the process, you required to provide data including but not limited to your phone number, full name and e-mail address.
 - **Payment information:** We collect payment information from our Players, including credit card number, Bank account, PayPal account number and other financial information that we may need in order to provide our Services to Players.
 - **Voluntary information:** We also collect information which you provide us voluntarily. We collect your information when you respond to communications from us, contact our support, communicate with us via email, website and through any online platform (e.g. our Facebook page) or share additional information about yourself or about others through your use of the Services.
 - **Device Information:** We also collect Personal Information from your device, such as geolocation data, IP address and other online identifiers (i.e. online data collected from user's devices, applications and protocols which leave traces which may be used to identify users).
 - We also collect information which you provide us voluntarily. For example, we collect Personal Information which you provide when you:
 - respond to communications from us;
 - open an account and use the Services; and
 - communicate with us via Facebook or via email or through any other means of direct contact
 - We collect information through our trusted third-party services, such as information about your credit history agencies and other financial information which is relevant to our Services, as well as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity.
 - We collect Personal Information which is related to Player's activity on the website as this information helps us to track fraudulent, unlawful or improper activity on the user's behalf.

III. HOW WE COLLECT YOUR INFORMATION?

- There are three main methods we may use to collect information:
 - We collect information through your use of the Services: when you are using our Services, we are aware of it and may gather the information relating to such usage, either independently or through the help of third-party services as detailed below.
 - When you visit or access our Website or when you interact or engage with our Services, we use (and authorize third parties to use) web beacons, cookies, pixel tags, scripts, tags and other technologies ("**Tracking Technologies**"). To learn more please visit our Cookie Policy.

- o The Tracking Technologies allow us to automatically collect information about you and your online behavior, as well as your device (for example your computer or mobile device), in order to enhance your navigation on our Website, improve our Website's performance and customize your experience on our Website. We also use this information to collect statistics about the usage of our Website, perform analytics, deliver content which is tailored to your interests and administer services to our Users, advertisers, publishers, customers and partners.
- o We also allow third parties to collect information about you through Tracking Technologies. This information is anonymized and cannot identify you, and is used for marketing and ad-targeting purposes.

IV. HOW WE USE THE INFORMATION WE COLLECT?

- We use and share Personal Information in the manners described in below:
 - o To set up your account and to provide our Services (e.g. send out cash-out checks, process your payments; etc.)
 - o To identify and authenticate your access to certain features of the Services;
 - o To market our websites and products (see below under “Marketing”);
 - o To serve you advertisements when you use our Services;
 - o To perform a research or to conduct analytics in order to improve and customize our Services to your needs and interests;
 - o To provide you with a responsible gaming environment;
 - o To support and troubleshoot our Services and to respond to your queries, as well as to enable you to exercise your rights;
 - o To prevent fraudulent or illegal activity; and
 - o To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

V. WITH WHOM WE SHARE THE INFORMATION WE COLLECT AND FOR WHAT PURPOSE?

- We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy.
- We share Personal Information with the following entities:
 - o our subsidiaries;
 - o subcontractors and other third party service providers, as described below;
 - o auditors or advisers of any of the Company's business processes;
 - o our service providers.
- We share Personal Information for the purposes listed above, as well as for the following purposes:
 - o Providing you with our Services;

- o Storing such information on our behalf;
 - o Processing such information to assist us with our business operations (e.g. to process payments and your deposits; authenticate your access; auditing our operations, etc.);
 - o In order to enhance the functionality of our Services.
 - o To administer the Services and analyze this information to improve and enhance the Services by expanding their features and functionality. Such data is also used for troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.
 - o Performing research, technical diagnostics or analytics.
 - o **Interest-based advertising:** we also use and share information we have about Players, including information collected through our Tracking Technologies, with our partners (in various jurisdictions around the world) for advertising purposes.
 - o **Marketing:** We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third party subcontractors for the purpose of providing you with promotional materials, concerning our Services, as well as products, services, websites and applications. Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. In addition, at any time, you may request to unsubscribe and discontinue receiving marketing offers by contacting by sending a blank message with the word "remove" to support@lottoday.com
- We also disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:
 - o comply with any applicable law, regulation, legal process or governmental request;
 - o enforce our policies (including our Agreement), including investigations of potential violations thereof;
 - o investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues, or to prevent harm to the rights, property or safety of us, our users, yourself or any third party;
 - o to establish or exercise our rights to defend against legal claims; or
 - o for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

VI. INFORMATION COLLECTED BY THIRD PARTIES

- Some content, features or products on our Website may link to or be hosted on or sponsored by third parties who may obtain Personal Information from you if you voluntarily submit such information or participate (for example, if you click on an advertisement or choose to participate in their activities, such as sweepstakes and promotions or if you provide any payment information as detailed above, or if you upload your CV on our career page). When you provide your Personal Information to such third parties, you allow them to collect, keep, manage use and disclose such information, and you also agree to be bound by their privacy policy which will detail how you may exercise your choice regarding your Personal Information. You should always review their privacy practices carefully before providing Personal Information to such third parties.

VII. HOW DO WE SAFEGUARD YOUR INFORMATION?

- We take great care in implementing and maintaining the security of the Services and your information.
- We employ industry standard procedures and policies to ensure the safety of our users' information, and prevent unauthorized use of any such information. When you submit Personal Information via the Website, your details are protected. Wherever we collect Personal Information, that information is encrypted and transmitted to us in a secure way.
- We use 128 SSL bit encryption to protect confidential Personal Information that is transmitted online. We also take measures to protect your Personal Information offline.
- Only employees who need access to particular information in order to perform their role (for example, billing or customer service) are granted access to our customers' Personal Information. The computers and servers in which we store personal data are kept in a highly secure environment.
- Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.
- As an additional safeguard to Your Information, the Company employs a Data Protection Officer ("DPO"). The DPO has the power to insist on company resources for information protection matters and has as a deep knowledge of Information protection regulation and law privacy requirements. The DPO's responsibility includes, among other things: privacy and security compliance advice, notify authorities of a data breach incident, conducting awareness and training programs, etc.

VIII. HOW DO WE TRASNFER YOUR DATA?

- Since we operate globally, it may be necessary to transfer your Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union – in these instances we will take steps to ensure that a similar level of protection is given to your Personal Information. By using or accessing our services, you consent to your information being collected, used, and transferred as disclosed herein.

IX. USERS RIGHTS

- This section addresses certain rights that you may exercise with respect to your Personal Information. We respect your privacy rights and therefore you may contact us at support@lottoday.com at any time and request:
 - o To access any Personal Information relating to you;
 - o To amend or rectify inaccuracies in Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected);
 - o To block or suppress processing of your Personal Information, in certain cases;
 - o To delete Personal Information relating to you;

- o That Personal Information you directly volunteered be provided to you in a machine readable portable format, where possible;
- We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.
- **Kindly note that the above rights are not absolute.** There are instances where our legitimate interests or applicable law allow or require us to refuse your request. In addition, in certain instances, your Personal Information may have been destroyed, erased or made anonymous in accordance with our retention obligations and practices.

If you wish to raise a complaint on how we have handled your Personal Information, please contact us directly at [Insert an email address]

X. RETENTION POLICY

- Except as otherwise permitted or required by applicable law or regulatory requirements, the Company endeavors to retain your Personal Information only for as long as it believes is necessary to fulfill the purposes for which Information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your Information, make it anonymous such that it cannot be associated with or tracked back to you.

XI. CORPORATE TRANSACTION

- We may share Information, including Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

XII. MINORS

- The Services are not designated to users under the age of 18. If you are under 18, you should not download or use the Services nor provide any Personal Information to us. We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at to support@lottoday.com

XIII. UPDATES OR AMENDMENTS TO THE PRIVACY POLICY

- We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website (as reflected in the "Last Revised" heading). We encourage you to review this Privacy Policy regularly for any changes. In case of material changes we will notify you through our Services or by email.
- Your continued use of the Services, following the notification of such amendments on our website, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

XIV. CONTACT US

- If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us at support@lottoday.com

- If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, please our DPO directly at [Insert an email address].
- If you are unsatisfied with our response, you can reach out to the applicable data protection authority: the Gibraltar Regulatory Authority.